

# Exhibit 1

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

**DEFENDANT FDEM'S FIRST SET OF REQUESTS  
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Fed. R. Civ. P. 34 and SDFL L.R. 26.1(e), Defendant FDEM hereby requests that Plaintiffs produce or make available for inspection and copying the following designated documents at the offices of Boies Schiller Flexner LLP, Attn: Jesse Panuccio, 401 East Las Olas Boulevard, Suite 1200, Fort Lauderdale, Florida, 33301, by August 4, 2025, at 5 P.M.

This request for documents shall be read and interpreted in accordance with the instructions and definitions set forth below.

**DEFINITIONS**

Notwithstanding any definition below, each word, term, or phrase used in this request for documents is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

1. *All*: The term “all” encompasses “any and all.”
2. *And*: The term “and” encompasses both “and” and “or.”
3. *Declarant*: The term “declarant” or “declarants” means any person who has submitted a declaration or affidavit supporting your filings in this matter.

4. *Document:* The terms “document” and “documents” are defined to be synonymous in meaning and equal in scope to the term “items” in Fed. R. Civ. P. 34(a)(1). A draft or non-identical copy is a separate document within the meaning of the term “document.”

5. *Person:* The term “person” is defined as any natural person or any business, legal or governmental entity or association.

6. *You/Your:* The terms “you” or “your” include the person(s) to whom these requests are addressed, and all of that person’s agents, officers, employees, directors, controlling shareholders, representatives, and attorneys.

7. The present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. Words in the masculine, feminine, or neuter form shall include each of the other genders.

### **INSTRUCTIONS**

1. You are requested to produce all drafts and notes, including typed, handwritten, or otherwise, that were made or prepared in connection with any produced documents.

2. Pursuant to Fed. R. Civ. P. 26(e), you have a duty to supplement any response to this request for production for which you learn that the response is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to us during the discovery process or in writing.

3. All documents that respond, in whole or in part, to any part or clause of any paragraph of these document requests shall be produced in their entirety, including all attachments and enclosures. Only one copy need be produced of documents that are responsive to more than one paragraph or are identical except for the person to whom it is addressed if you indicate the persons or group of persons to whom such documents were distributed. Documents that in their

original condition were stapled, clipped, or otherwise fastened together shall be produced in such form. Please place the documents called for by each paragraph in a separate file folder or other enclosure so marked, identifying the paragraph to which such documents respond, and if any document is responsive to more than one request, indicate each request to which it responds.

**DOCUMENT REQUESTS**

1. Produce all documents in your possession that identify the sighting of a panther, bonneted bat, snail kite, wood stork, or Eastern indigo snake within a three-mile radius of the Dade-Collier Training and Transition Airport within the past five years.
2. Produce all documents in your possession showing that any declarants who are also Plaintiffs' members or employees, or any witnesses who you intend to call at the August 6, 2025 preliminary-injunction hearing who are also Plaintiffs' members or employees, have visited an area within five miles of the Dade-Collier Training and Transition Airport between June 2022 to present.
3. Produce all documents that Dr. Christopher W. McVoy, Dr. Robert A. Frakes, and Randy S. Kautz consulted or relied upon to prepare their declarations.

Dated: July 29, 2025

James Uthmeier

*Attorney General of Florida*

Jeffrey Paul DeSousa (FBN 110951)

*Acting Solicitor General*

Nathan A. Forrester (FBN 1045107)

*Chief Deputy Solicitor General*

Robert S. Schenck (FBN 1044532)

*Assistant Solicitor General*

**Office of the Attorney General**

The Capitol, PL-01

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Respectfully submitted,

s/ Jesse Panuccio

Jesse Panuccio (FBN 31401)

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*Counsel for Kevin Guthrie, in his official  
capacity as Executive Director of the Florida  
Division of Emergency Management*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2025, the foregoing was served to counsel for Plaintiffs via email.

s/ Jesse Panuccio

Jesse Panuccio